

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

BL TRADING, LLC,

Defendant

Criminal Case No. 10-CR-10413-NG

**ASSENTED-TO MOTION FOR ORDER OF EXCLUDABLE DELAY
PURSUANT TO THE SPEEDY TRIAL ACT**

The United States of America moves for an order designating the period from the filing of the Information in this case on December 7, 2010, through the date of the status conference held on January 20, 2011, and the additional period from the date of the status conference through February 19, 2013, the termination of the deferred prosecution agreement, as excludable delay pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(2) (allowing the exclusion of a period of deferred prosecution pursuant to a written agreement and with the approval of the Court).

The United States requests that these periods be excluded because the parties have entered into an agreement that is intended to defer prosecution of BL Trading, LLC, for the purpose of allowing the company to demonstrate its good conduct by establishing and adhering to a strict corporate compliance program. Under paragraph 2 of the agreement, unless the agreement terminates earlier because of a material breach, the agreement is effective until it terminates thirty days after the second anniversary of the agreement's acceptance by the Court. The termination date is thus expected to be two years plus thirty days from January 20, 2011, which is February 19, 2013. Defendant assents to excluding this time. The United States therefore moves the Court to exclude the time from December 7, 2010, through February 19, 2013, as excludable delay pursuant to the

Speedy Trial Act, 18 U.S.C. § 3161(h)(2).

In addition, the United States moves the Court to schedule a status conference regarding the agreement on February 19, 2013.

Respectfully submitted,

CARMEN M. ORTIZ
UNITED STATES ATTORNEY

Date: January 20, 2011

By: /s/ Scott L. Garland
Scott L. Garland
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document filed through the ECF system will be sent electronically to counsel for Defendant, who is a registered participant as identified on the Notice of Electronic Filing (NEF).

Date: January 20, 2011

/s/ Scott L. Garland
Scott L. Garland
Assistant United States Attorney